

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI: EASTERN DIVISION

HANS MOKE NIEMANN,

Plaintiff,

v.

SVEN MAGNUS ØEN CARLSEN A/K/A
MAGNUS CARLSEN, PLAY MAGNUS
AS D/B/A PLAY MAGNUS GROUP,
CHESS.COM, LLC, DANIEL RENSCH
A/K/A “DANNY” RENSCH, AND
HIKARU NAKAMURA,

Defendants.

Civil Action No. 4:22-CV-01110

Hon. Audrey G. Fleissig

**PLAINTIFF HANS MOKE NIEMANN’S MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO DEFENDANT PLAY MAGNUS AS’ MOTION TO DISMISS**

Plaintiff Hans Moke Niemann (“Plaintiff”) respectfully submits this motion for an order granting Plaintiff a one-week extension of time (*i.e.*, until May 2, 2023) to file his opposition to Defendant Play Magnus AS d/b/a Play Magnus Group’s (“Play Magnus”) motion to dismiss.

In support, Plaintiff states as follows:

1. On April 11, 2023, Play Magnus filed a motion to dismiss Plaintiff’s Second Amended Complaint. Dkt. 126.
2. Pursuant to Local Rule 4.01, the deadline for Plaintiff to file his response to Play Magnus’ motion to dismiss is April 25, 2023.
3. Counsel for Play Magnus consents to Plaintiff’s request for an extension of time until May 2, 2023 to file his response to the motion to dismiss.
4. The reason for this request is that counsel for Plaintiff requires additional time to prepare a response in light of their travel schedules and other conflicting commitments.

5. For the foregoing reasons, Plaintiff respectfully requests that the Court order a one-week extension of time (*i.e.*, until May 2, 2023) to respond to Play Magnus' motion to dismiss.

Dated: New York, New York
April 18, 2023

Respectfully submitted,

s/ Andrew J. Urgenson

Terrence A. Oved, Esq.

(admitted *pro hac vice*)

Darren Oved, Esq.

(admitted *pro hac vice*)

Andrew Urgenson, Esq.

(admitted *pro hac vice*)

James Reilly, Esq.

(admitted *pro hac vice*)

OVED & OVED LLP

Attorneys for Plaintiff

401 Greenwich Street

New York, New York 10013

Tel: 212.226.2700

and

Matthew Gartner, Esq. (#64320)

THE GARTNER LAW FIRM

Attorneys for Plaintiff

220 Salt Lick Road

St. Peters, Missouri 63376

Tel: 636.397.2111

matthew@gartnerlawfirm.com